

**REMARKS**

Favorable reconsideration of the application is respectfully requested in light of the amendments and remarks herein.

Upon entry of this amendment, claims 1-6 and 8-18 will be pending. By this amendment, claims 1, 8 and 13 have been amended. No new matter has been added.

**§ 103 Rejection of Claims 1, 6, and 13**

In Section 6 of the Office Action, claims 1, 6, and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bruce Schneier's Applied Cryptography (hereinafter referred to as "Schneier") in view of Sasaki et al. (U.S. Patent No. 6,378,071; hereinafter referred to as "Sasaki"). Claim 1 has been amended to address the rejection.

Conventionally, when encrypting compressed data and recording it in a storage medium, the compression blocks and encryption blocks usually do not match. Therefore, when reading data from the storage medium in units of a compression block, part of the data in an encryption block sometimes is not read out and accurate decryption can no longer be performed. Further, when editing data recorded in a storage medium, for example, data is divided and combined in units of a compression block. In this case, there is a good possibility that part of the data of the encryption block will no longer be included in the edited data and accurate decryption may not be possible.

To solve the above-described problem of the conventional encryption/compression techniques, embodiments of the present invention include apparatus, system, and method for efficiently encrypting and processing data.

For example, the structure of data processing apparatus claim 1, as presented herein,

includes:

“A data processing apparatus comprising:

*encrypting means* for encrypting data in units of an encryption block having a predetermined data length;

*processing means* for defining a plurality of processing blocks, each processing block having a data block length of a whole multiple of said predetermined length of said encryption block and for expanding compressed data in units of said predetermined processing block length,

wherein said encryption block is configured to not straddle any of said plurality of processing blocks;

*storage means* for storing the encrypted data; and

*control means* for writing the encrypted data in said storage means so that the data positioned in the same encryption block is also positioned in the same processing block, said control means reading the data from said storage means in units of the processing block,

*wherein* said stored encrypted data is compressed into minimum readable data units such that there are no breaks between the stored encryption blocks and the processing load to access the data is thereby reduced when accessing encrypted audio data stored in said storage means.”

(emphasis added)

Accordingly, in one aspect of claim 1, the processing means defines a plurality of processing blocks, each processing block having a data block length of a whole multiple of the predetermined length of the encryption block and for expanding compressed data in units of the predetermined processing block length, wherein the encryption block is configured to not straddle any of the plurality of processing blocks. *Specification, page 29, lines 1-5.* Further, there is storage means for storing the encrypted data and control means for writing the encrypted data and reading the encrypted data. *See e.g., Specification, page 29, lines 18-22.* The stored encrypted data is compressed into minimum readable data units such that there are no breaks

between the stored encryption blocks and the processing load to access the data is thereby reduced when accessing encrypted audio data stored in said storage means. An embodiment of this limitation is disclosed in the specification: “The audio data stored in flash memory 34 is compressed as mentioned later. The unit of compression is the sound unit SU. Accordingly, when audio data is read from the portable storage device 3 to the portable player 4, the minimum readable unit is a sound unit SU. Because of this, there are no breaks between the encryption blocks and the processing load to access the data is thereby reduced when accessing encrypted audio data stored in the flash memory 34.” *Specification, page 29, lines 6-11.*

By contrast, neither Schneier nor Sasaki teach or suggest the data processing apparatus of claim 1, as amended herein, *wherein* said stored encrypted data is compressed into minimum readable data units such that there are no breaks between the stored encryption blocks and the processing load to access the data is thereby reduced when accessing encrypted audio data stored in said storage means. Therefore, Schneier and Sasaki, individually or in combination, fail to teach or suggest all the limitations of claim 1.

Based on the foregoing discussion, claim 1 should be allowable over Schneier and Sasaki. Since claim 13 closely parallels, and recites substantially similar limitations as recited in, claim 1, claim 13 should also be allowable over Schneier and Sasaki. Further, since claim 6 depends from claim 1, claim 6 should also be allowable over Schneier and Sasaki.

Accordingly, it is submitted that the rejection of claims 1, 6, and 13 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

§ 103 Rejection of Claims 2 – 3, 14 – 15, and 18

In Section 9 of the Office Action, claims 2 – 3, 14 – 15, and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Sasaki, and in further view of Bellovin et al. (U.S. Patent No. 5,241,599; hereinafter referred to as "Bellovin").

Based on the foregoing discussion regarding claims 1 and 13, and since claims 2-3, 14-15, and 18 depend from one of claims 1 and 13, claims 2-3, 14-15, and 18 should also be allowable over Schneier and Sasaki. Regarding claims 2 and 14, Bellovin was merely cited for teaching the insertion of data in order to meet the predetermined length of block. Regarding claims 3, 15 and 18, Bellovin was merely cited for teaching an encryption process using the block to be encrypted and a ciphertext from the previous block in the form of cipher-block chaining. Therefore, it is maintained that Schneier, Sasaki, and Bellovin, individually or in combination, fail to teach or suggest all the limitations of claims 2-3, 14-15, and 18.

Accordingly, it is submitted that the rejection of claims 2 – 3, 14 – 15, and 18 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

§ 103 Rejection of Claims 4 and 16

In Section 12 of the Office Action, claims 4 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier, Sasaki, and Bellovin, and in further view of Cassagnol (U.S. Patent 6,385,727).

Based on the foregoing discussion regarding claims 1 and 13, and since claims 4 and 16 depend from claims 1 and 13, respectively, claims 4 and 16 should also be allowable over Schneier, Sasaki, and Bellovin. Further, since Cassagnol was merely cited for teaching the

storing of values initially used when encrypting stored in one of the processing blocks, it is maintained that Schneier, Sasaki, Bellovin, and Cassagnol, individually or in combination, fail to teach or suggest all the limitations of claims 4 and 16.

Accordingly, it is submitted that the rejection of claims 4 and 16 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### § 103 Rejection of Claims 5 and 17

In Section 13 of the Office Action, claims 5 and 17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier, Sasaki, Bellovin, and Cassagnol, and in further view of Yuenyongsgool (U.S. Patent 6,202,152).

Based on the foregoing discussion regarding claims 1 and 13, and since claims 5 and 17 depend from claims 1 and 13, respectively, claims 5 and 17 should also be allowable over Schneier, Sasaki, Bellovin, and Cassagnol. Further, since Yuenyongsgool was merely cited for teaching the storage of data by consecutive addresses, it is maintained that Schneier, Sasaki, Bellovin, Cassagnol, and Yuenyongsgool, individually or in combination, fail to teach or suggest all the limitations of claims 5 and 17.

Accordingly, it is submitted that the rejection of claims 5 and 17 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### § 103 Rejection of Claim 8

In Section 14 of the Office Action, claim 8 stands rejected under 35 U.S.C. §103(a) as

being unpatentable over Schneier in view of Sasaki, and in further view of Bahout *et al.* (U.S. Patent 5,594,793; hereinafter referred to as “Bahout”).

Based on the foregoing discussion regarding claim 1, and since claim 8 closely parallels, and recites substantially similar limitations as recited in, claim 1, claim 8 should also be allowable over Schneier and Sasaki. Further, since Bahout was merely cited for teaching a system for mutual identification between the storage and data processing apparatuses using stored keys and algorithms within the data processor, it is maintained that Schneier, Sasaki, and Bahout, individually or in combination, fail to teach or suggest all the limitations of claim 8.

Accordingly, it is submitted that the rejection of claim 8 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### § 103 Rejection of Claims 9 and 10

In Section 15 of the Office Action, of the Office Action, claims 9 and 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Sasaki and Bahout, and in further view of Bellovin.

Based on the foregoing discussion regarding claim 8, and since claims 9 and 10 depend from claim 8, claims 9 and 10 should also be allowable over Schneier, Sasaki, and Bahout. With regard to claim 9, Bellovin was merely cited for teaching the insertion of data in order to meet the predetermined length of block. With regard to claim 10, Bellovin was merely cited for teaching an encryption process using the block to be encrypted and a ciphertext from the previous block in the form of cipher-block chaining. Therefore, it is maintained that Schneier, Sasaki, Bahout, and Bellovin, individually or in combination, fail to teach or suggest all the limitations of claims 9 and 10.

Accordingly, it is submitted that the rejection of claims 9 and 10 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### § 103 Rejection of Claim 11

In Section 18 of the Office Action, claim 11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Sasaki, Bahout, Bellovin, and in further view of Cassagnol.

Based on the foregoing discussion regarding claim 10, and since claim 11 depends from claim 10, claim 11 should also be allowable over Schneier, Sasaki, Bahout, and Bellovin. Further, since Cassagnol was merely cited for teaching the storing of values initially used when encrypting stored in one of the processing blocks, it is maintained that Schneier, Sasaki, Bahout, Bellovin, and Cassagnol, individually or in combination, fail to teach or suggest all the limitations of claim 11.

Accordingly, it is submitted that the rejection of claim 11 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### §103 Rejection of Claim 12

In Section 19 of the Office Action, claim 12 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Sasaki, Bahout, Bellovin, and Cassagnol, and in further view of Yuenyongsgool.

Claim 12, as presented herein, recites:

“The data processing system as set forth in claim 11,

*wherein the second control means stores said one or more processing blocks at consecutive addresses of said storage means in the order of encryption, stores said one or more encryption blocks in said processing blocks at consecutive addresses of said storage means in the order of encryption, and stores said initial values at an address immediately prior to the address of at which the first encryption block in the cluster is stored.*

(emphasis added)

Accordingly, in one aspect of claim 12, the second control means stores said one or more processing blocks at consecutive addresses of said storage means in the order of encryption, stores said one or more encryption blocks in said processing blocks at consecutive addresses of said storage means in the order of encryption, and stores said initial values at an address immediately prior to the address of at which the first encryption block in the cluster is stored.

Based on the foregoing discussion regarding claim 11, and since claim 12 depends from claim 11, claim 12 should also be allowable over Schneier, Sasaki, Bahout, Bellovin, and Cassagnol. Yuenyongsgool was cited for teaching the storage of data by consecutive addresses. Yet Yuenyongsgool does not discuss storage of one or more processing blocks, nor storage of one or more encryption blocks, at consecutive addresses of said storage means in the order of encryption. Nor does Yuenyongsgool discuss storing initial values at an address immediately prior to the address of at which the first encryption block in the cluster is stored, as claimed (emphasis added). Therefore, it is maintained that Schneier, Sasaki, Bahout, Bellovin, Cassagnol, and Yuenyongsgool, individually or in combination, fail to teach or suggest all the limitations of claim 12.

Accordingly, it is submitted that the rejection of claim 12 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.



Conclusion

In view of the foregoing, entry of this amendment, and the allowance of this application with claims 1-6 and 8-18 are respectfully solicited.

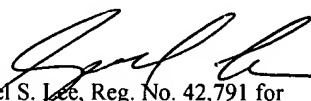
In regard to the claims amended herein and throughout the prosecution of this application, it is submitted that these claims, as originally presented, are patentably distinct over the prior art of record, and that these claims were in full compliance with the requirements of 35 U.S.C. §112. Changes that have been made to these claims were not made for the purpose of patentability within the meaning of 35 U.S.C. §§101, 102, 103 or 112. Rather, these changes were made simply for clarification and to round out the scope of protection to which Applicant is entitled.

In the event that additional cooperation in this case may be helpful to complete its prosecution, the Examiner is cordially invited to contact Applicant's representative at the telephone number written below.

The Commissioner is hereby authorized to charge any insufficient fees or credit any overpayment associated with the above-identified application to Deposit Account 50-0320.

Respectfully submitted,

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